

March 27, 2018

BY HAND DELIVERY AND ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4805 - 2018 Annual Retail Rate Filing
Responses to PUC Data Requests – Set 2**

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's¹ response to the PUC's second set of data requests in the above-referenced docket.

This filing also includes a Motion for Protective Treatment of Confidential Information (Motion) in accordance with Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). Specifically, the Company seeks confidential treatment of the customer's identity, which is included in the Company's response to PUC 2-1. In compliance with Rule 1.2(g), National Grid has provided the PUC with one complete, un-redacted copy of the confidential response to PUC 2-1 in a sealed envelope marked: **"Contains Privileged and Confidential Materials – Do Not Release."** The Company has included redacted copies of this response for the public filing. Pursuant to PUC Rule 1.2(g)(2), the Company respectfully requests that the PUC preliminarily grant the Company's request for confidential treatment pending the PUC's ruling on the Motion.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4805 Service List
John Bell, Division
Leo Wold, Esq.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

2018 Annual Retail Rate Filing

Docket No. 4805

**NATIONAL GRID'S MOTION FOR PROTECTIVE TREATMENT
OF CONFIDENTIAL INFORMATION**

National Grid¹ respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I. Gen. Laws § 38-2-2(4)(B). National Grid also respectfully requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

I. BACKGROUND

On March 27, 2018, National Grid filed with the PUC its response to the PUC's data request 2-1. In responding to this data request, the Company identified a customer by name. The Company seeks confidential treatment of the customer's identity because the Company is obligated to protect this customer's privacy. Moreover, the PUC has historically afforded confidential treatment to National Grid's customers' identities.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

II. LEGAL STANDARD

The PUC's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws §38-2-1 *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is considered as a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws §38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to treat such information as confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(A)(I)(b) provides that the following types of records shall not be deemed public:

Personnel and other personal individually identifiable records otherwise deemed confidential by federal or state law or regulation, or the disclosure of which would constitute a clearly unwarranted invasion of personal privacy pursuant to 5 U.S.C. § 552 *et seq.* . . . R.I. Gen. Laws § 38-2-2(4)(A)(I)(b). Public disclosure of the customer identified in the Company's response to PUC 2-1 would constitute an unwarranted invasion of personal privacy.

III. BASIS FOR CONFIDENTIALITY

As discussed above, National Grid respectfully requests confidential and privileged treatment of the customer's name included in the Company's response to data request PUC 2-1. The Company would not ordinarily disclose its customers' identities and account information to the public, and disclosing such information to the public would constitute an unwarranted

invasion of customers' privacy, including the customer identified in the Company's response to data request PUC 2-1. The PUC has also historically granted confidential treatment to customer-specific information.

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the customer name included in the Company's response to PUC 2-1. **WHEREFORE**, for the foregoing reasons, the Company respectfully requests that the PUC grant its Motion for Protective Treatment.

Respectfully submitted,

NATIONAL GRID

By its attorneys,



Raquel J. Webster, RI Bar # 9064
National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2121

Dated: March 27, 2018

Redacted
PUC 2-1

Request:

Referencing the Company's Revised Filing, Adam S. Crary's testimony, page 45, please identify the large customer whose meter was incorrectly programmed. Please answer:

- (a) How was the meter problem identified?
- (b) How long did the meter problem exist? Please provide dates, if possible.
- (c) When was the customer notified of the under-billing?
- (d) What number of kWh were under-billed?
- (e) How much revenue was under-billed?
- (f) Did the under-billed kWh effect distribution and/or energy efficiency collections? If yes, please identify the amounts.
- (g) Was any under-billed revenue and interest credited in 2016? Please explain your answer.
- (h) Is the company seeking recovery of the under-billed revenue? Please explain why or why not.
- (i) Please explain the phrase, "the Company will include similar adjustments in upcoming reconciliation filings." Please identify the dockets and the amounts to be reconciled.
- (j) Please identify each schedule in the 2018 Retail Rate Filing, and Revised Filing where appropriate, where an adjustment for this issue is included. Include dollar amounts, schedule number, line, and column references where appropriate.

Response:

The large customer whose meter was incorrectly programmed was [REDACTED].

- (a) In September 2016, the Company exchanged a meter at the customer's location due to an error code displaying on the meter. As part of the Company's meter multiplier verification process, the Company discovered that the meter's multiplier of 0.06 was different than the multiplier used for the previous meter of 0.04. In October 2016, the multiplier used for the previous meter of 0.04 was verified as incorrect, and the multiplier was corrected in the new meter so all usage on a prospective basis would be correct.
- (b) The Company determined that the meter multiplier problem began in April 2004.
- (c) The Company notified the customer of the under-billing in November 2016.

PUC 2-1, page 2

- (d) The Company determined that there was 55,612,613 kWh unbilled to this customer in April 2004 through September 2016.
- (e) Please see Attachment PUC 2-1 for a summary of the revenue under-billed by billing component.
- (f) Yes. The under-billing affected distribution and energy efficiency revenue and other components of the Company's bills to this customer based on kWh and kW meter readings. Attachment PUC 2-1 presents a summary of the under-billing related to the various components of the customer's bill. The attachment is separated into those included in this filing (lines (1) through (6)) and those that the Company will include in upcoming filings (lines (8) through (12)).
- (g) The Company did not credit any under-billed revenue or interest to customers in 2016.
- (h) As described in the testimony of Mr. Crary on page 45, the improperly programmed meter reported under-stated usage and, consequently, the Company under-billed the customer. Although the Company has the right to bill this customer under the filed rate doctrine since the customer received service at a higher volume of usage and should have compensated the Company for such service, the Company elected to not rebill the customer because the under-reported usage was not the result of a customer action, and the customer was not aware of the under-reported usage. To ensure that all customers are not negatively impacted by having less revenue in the various reconciling mechanisms submitted to the PUC for approval, the Company is including adjustments to reflect additional revenue and interest, where applicable, in the reconciliations as if the customer had been billed at the correct usage. The Company's shareholders (not customers) will fund the credit adjustments to the various reconciling mechanisms.
- (i) The Company submits several filings regarding its reconciling mechanisms. Therefore, more filings will reflect a revenue credit beyond the Annual Retail Rate filing. The phrase "the Company will include similar adjustments in upcoming reconciliation filings" is intended to indicate that the Company will reflect credits in all filings that involve reconciling mechanisms impacted by the under-billings, as shown in Attachment PUC 2-1.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4805
In Re: 2018 Retail Rate Filing
Responses to the Commission's Second Set of Data Requests
Issued on March 23, 2018

PUC 2-1, page 3

- (j) The table below identifies the locations in the schedules in this filing that include the proposed revenue adjustments.

Reconciliation	Adjustment Amount	Schedule
Standard Offer Service Base	\$1,464,568, Att. PUC 2-1, Line (1) Total	ASC-2 Revised, Page 5, Line (1), Column (a) Industrial
Standard Offer Service Base	(\$2,870), Att. PUC 2-1, Line (3) Total	ASC-2 Revised, Page 5, Line (1), Column (a) Industrial
Standard Offer Service Admin. Cost	\$1,108, Att. PUC 2-1, Line (2) Total	ASC-5 Revised Page 5, Line (1), Column (a) Industrial
Transmission Service Reconciliation	\$735,610, Att. PUC 2-1, Line (4) Total	ASC-12, Page 3, Line (1), Column (d), Rate B-32/G- 32
Non-Bypassable Transition Charge Reconciliation	\$225,897, Att. PUC 2-1, Line (5) Total	ASC-10, Page 1, Column (b), January 2017
Long Term Contracting Reconciliation	\$16,059, Att. PUC 2-1, Line (6) Total	ASC-18, Page 3, Line (1), Column (g)

The Narragansett Electric Company
d/b/a National Grid
Meter Multiplier Adjustment With Interest

	<u>Adjustment</u>	<u>Interest</u>	<u>Total</u>
<u>Annual Retail Rate Filing</u>			
(1) Standard Offer Service Base	\$1,101,052	\$363,516	\$1,464,568
(2) Standard Offer Service Administration Factor	\$1,070	\$38	\$1,108
(3) Standard Offer Service Adjustment Factor	(\$2,771)	(\$98)	(\$2,870)
(4) Transmission	\$638,722	\$96,888	\$735,610
(5) Transition	\$163,333	\$62,564	\$225,897
(6) Long Term Contracting Renewable Energy Recovery	<u>\$15,913</u>	<u>\$146</u>	<u>\$16,059</u>
(7) Sub-Total	\$1,917,319	\$523,053	\$2,440,372
<u>Other Filings</u>			
(8) Revenue Decoupling Mechanism (RDM)	\$298,783	\$90,890	\$389,673
(9) Pension / PBOP	\$465	\$0	\$465
(10) Infrastructure, Safety, and Reliability	\$27,195	\$0	\$27,195
(11) RES	\$6,983	\$1,176	\$8,160
(12) Energy Efficiency	<u>\$295,596</u>	<u>\$0</u>	<u>\$295,596</u>
(13) Sub-Total	<u>\$629,023</u>	<u>\$92,066</u>	<u>\$721,089</u>
(14) Total to be Reflected as Credit to Customers in Filings	\$2,546,341	\$615,119	\$3,161,460
(15) Pre-RDM Amount Impacting Earnings	<u>\$405,129</u>		<u>\$405,129</u>
(16) Total of Differences Due to Meter Multiplier Impacting Customers/Company	\$2,951,470	\$615,119	\$3,566,589
(17) Differences Resulting from Lower Billings-No Impact	<u>\$454,120</u>		<u>\$454,120</u>
(18) Grand Total of Differences Due to Meter Multiplier	\$3,405,590	\$615,119	\$4,020,709
(7) Sum of Lines (1) through (6)			
(13) Sum of Lines (8) through (12)			
(14) Line (7) + Line (13)			
(15) Amounts that would have affected RDM but were pre-RDM and therefore were not included and lowered Earnings			
(16) Line (14) + Line (15)			
(17) Amounts such as Renewables Fund and GRT which were not billed or collected and do not affect reconciliations			
(18) Line (16) + Line (17)			